

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AT&T CORP., a New York corporation,
Plaintiff,

v.

IBASIS, INC., a Delaware corporation,
and CHINA UNICOM CORPORATION,
LTD., a Republic of China corporation,
Defendants.

No. 04 10871 PBS

JOINT PROPOSED PRE-TRIAL SCHEDULE¹

Pursuant to Local Rule 16.1, the parties to the above entitled matter hereby submit this proposed Pre-Trial Schedule.

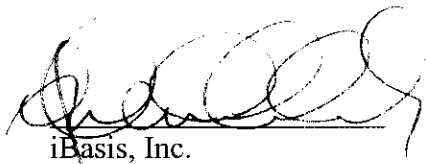
- 11/4/04 Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) completed
- 5/2/05 All discovery completed (i.e., written discovery served by 3/18/05 and depositions noticed to be taken by 3/18/05), except that in no event shall a party have less than 30 days within which to take discovery arising out of a late production of information from another party.
- 6/15/05 All Motions to Compel filed
- 8/1/04 All summary judgment motions filed

The parties request that the Court set the Final Pre-Trial Conference for a date within 45 days of a decision on all summary judgment motions, or by 7/31/05 if no summary judgment motions are filed by either party.

¹ This Joint Proposed Pre-Trial Schedule was prepared without input from defendant China Unicom Corporation, Ltd. ("China Unicom"), as that entity has not responded to the Complaint. Formal service of China Unicom via the Chinese government is estimated to take approximately six months. The duration of time required for formal service is due, in part, to the requirement that the Complaint and all exhibits be translated into Chinese. Accordingly, once China Unicom is served, should it respond to the Complaint, AT&T may request the Court continue the discovery cut-off dates and all other pre-trial and trial related deadlines.

Certifications

iBasis and its counsel hereby certify that they have conferred (a) with a view to establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation; and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in LR 16.4.



iBasis, Inc.
By Jonathan Draluck,
Vice President of Business Affairs &
General Counsel



Shepard Davidson, Esquire

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AT&T Corp.

By: _____

Kathryn L. Kempton, Esquire

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iBasis, Inc.
By: Jonathan Draluck,
Vice President of Business Affairs &
General Counsel

Shepard Davidson, Esquire

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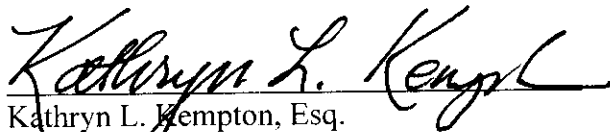
AT&T Corp.
By: Marta Wingo

Kathryn L. Kempton, Esquire

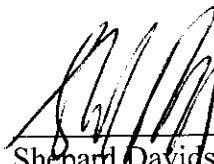
Respectfully submitted,

AT&T CORP.,
By its Attorneys

IBASIS INC.,
By its attorneys,



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Dated: October 28, 2004